

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

State of Oklahoma,)	
)	
Plaintiffs,)	Case No.: 4:05-cv-00329-GKF-PJC
)	
v.)	
)	
Tyson Foods, Inc., et. al.)	
)	
Defendants.)	
)	

DECLARATION OF ROGER TOURANGEAU, Ph.D.

I, Roger Tourangeau, Ph.D., hereby state as follows:

1. I am a Research Professor with the Survey Research Center at the University of Michigan as well as a Research Professor for the Joint Program in Survey Methodology at the University of Maryland. Prior to joining the University of Michigan, I worked at the National Opinion Research Center and the Gallup Organization.
2. In 1979 I received my Ph.D. from Yale University in Psychology. I have nearly 30 years of experience in the field of research science, including survey methodology and research analysis.
3. I am one of the authors of the State of Oklahoma's expert report entitled "Natural Resource Damages Associated with Aesthetic and Ecosystem Injuries to Oklahoma's Illinois River System and Tenkiller Lake – Expert Report for State of Oklahoma, in Case No. 05-CV-0329-GKF-SAJ" (hereinafter "CV Report").
4. I have reviewed Defendants' damages report entitled "Evaluation of Hypothetical Remediation Strategy Presented in Stratus Contingent Value Study Illinois River

Watershed” dated March 2009, authored by John P. Connolly, Timothy J. Sullivan, and Frank Coale (the “Connolly Report”).


5. In social science research, particularly social psychology, it is a well-established, standard and common practice that information be withheld from the study participants or that information that is not factually correct be provided to them. The acceptability of this practice is discussed at length in the social science literature.
6. It is often necessary in social science studies generally, and in contingent valuation studies more specifically, that information be withheld from participants or that information that is not factually correct be presented to them so that the participants take the information in the intended way and take their task seriously.
7. In the context of the contingent valuation survey that was conducted for this case, the survey was designed to measure what respondents were willing to pay for speeding up the recovery of the Illinois River and Tenkiller Lake. The alum treatments described in the survey were merely a vehicle for measuring the respondents’ willingness to pay. The validity of the respondents’ answers depends only on whether *they* found the alum treatments to be a plausible method for speeding up the recovery of the river and lake, not on whether such treatments would actually be carried out or would be effective if they were carried out.
8. In the survey discussed in the CV Report, it is evident from the survey results that a large majority of the respondents understood and accepted the accelerated cleanup scenario and believed their choices were consequential. Thus, regardless of whether the State ultimately implements an alum program and whether an alum program

would be practical, effective, or have collateral impacts, the results of the survey are valid and reliable.

9. The use of the hypothetical alum scenario in the contingent valuation survey was necessary and appropriate under the standard methodology used in contingent valuation surveys, and under the standards of social science research more generally, and the results of the contingent valuation survey are valid and reliable. The use of a hypothetical scenario in no way renders the results of the study invalid or unreliable.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 10, 2009



Roger Tourangeau, Ph.D.